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7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON

9 THE ESTATE OF CINDY LOU HILL, by
and through its personal representative,
10 Joseph A. Grube; and CYNTHIA
METSKER, individually,

11 Plaintiffs,

12 vs.

13 NAPHCARE, INC, an Alabama
corporation; HANNAH GUBITZ,
14 individually; and SPOKANE COUNTY,
a political subdivision of the State of
15 Washington,

16 Defendants.
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No. 2:20-cv-00410-MKD

PLAINTIFFS' EXHIBIT LIST

Plaintiffs expect to introduce some or all of the following exhibits at trial:

Exhibit No.	Description
1.	NaphCare receiving screening of Cindy Hill (8/21/18)
2.	NaphCare initial assessment of Cindy Hill (8/21/18)
3.	NaphCare progress notes regarding Cindy Hill (August 2018)
4.	NaphCare COWS assessments of Cindy Hill (August 2018)
5.	Medical Watch General Observation form (8/25/18)
6.	8/26/18 e-mail from Gubitz to Ordaz and O'Neill
7.	8/26/18 – 8/27/18 e-mail string Re: Spokane
8.	Cindy Hill autopsy report
9.	NaphCare death summaries regarding Cindy Hill
10.	NaphCare M&M Committee minutes (10/15/18)
11.	NaphCare M&M Committee minutes (1/14/19)
12.	Death review by Steven Hammond
13.	1/3/19 e-mail from Maple to Ordaz
14.	NaphCare employee time detail (August 2018)
15.	SCDC policy regarding Inmate Safety Checks
16.	SCDC policy regarding Watch Cells
17.	Medical animation (<i>to be offered for illustrative purposes only</i>)
18.	NaphCare Healthcare Policy & Procedure Manual
19.	Photo showing Cells 2W-27 and 2W-28
20.	Photo showing Cell 2W-27 door
21.	Photo showing Medical Watch General Observation form posted on door of Cell 2W-27
22.	Photo showing food slot in cell door (with food)
23.	Photo showing interior of Cell 2W-27
24.	Photo showing interior of Cell 2W-27
25.	Photo showing bodily fluid on cell floor
26.	Photo of Cindy Hill with Cynthia as a baby
27.	Photo of Cindy Hill with Cynthia and Cody

28.	Photo of Cindy Hill with Cynthia - birthday
29.	Video of 3W lower tier
30.	Photo of Spokane County Jail (<i>to be offered for illustrative purposes only</i>)

Plaintiff may use other documents and materials produced or generated in this action, not listed above, solely for impeachment purposes.

Respectfully submitted this 12th day of May, 2022.

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CERTIFICATE OF SERVICE

The undersigned certifies that on the date stated below this document was filed with the Clerk of the Court for the United States District Court for the Eastern District of Washington, via the CM/ECF system, which will send notification of such filing to the following e-mail addresses:

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Dated this 12th day of May, 2022.

s/ Hank Balson
Hank Balson